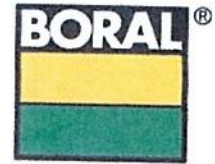


Build something great™



August 27, 2018

Boral Roofing LLC
200 Mansell Court East

Suite 305

Roswell, GA 30076

Attention: Mr. Brian Storey

U.S. Environmental Protection Agency
Sector Policies and Programs Division
Office of Air Quality Planning and Standards
109 T.W. Alexander Drive, Mail Code: D243-04
Research Triangle Park, NC 27709

T: 770.645.4529

F: 770.645.4531

www.boral.com

RE: Request for Extension of Compliance
40 CFR 63, Subpart JJJJJ NESHAP
Brick and Structural Clay Products Manufacturing Source Category

Mr. Storey:

Please find enclosed our request for extension of the compliance deadline for our facility located at 909 Railroad Street in Corona, CA.

While the facility is in process of design work and permitting for a Dry Injection Fabric Filter (DIFF) unit, we are unable to meet the compliance date of December 26, 2018. Therefore, Boral is requesting a one-year extension.

If you have any questions, concerns, or require additional information, please feel free to contact me by telephone at (678) 491-4911 or by email at Kelly.mccormick@boral.com.

Sincerely,

Kelly R McCormick
Environmental Director

Enclosures

CC: John Quigley, Jan Kovacovsky, Ian Hacker, Mike Olvera – Roofing Corona

Request for Extension of Compliance

40 C.F.R. Part 63, Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants

Brick and Structural Clay Products Manufacturing Source Category

I. GENERAL INFORMATION

A. Facility Information

Facility Name Boral Roofing LLC

Facility Street Address 909 Railroad Street, Corona, CA 92882

Facility Local Contact Name	Title	Phone (OPTIONAL)
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<u>Jan Kovacovsky</u>	<u>Environmental Manager</u>	<u>949 737-0200</u>
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City	State	ZIP Code
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<u>Corona</u>	<u>CA</u>	<u>92882</u>
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Operating Permit Number (OPTIONAL)

Facility I.D. Number (OPTIONAL)

Click here to enter text. 001073

Responsible Official's Name/Title

John Quigley/Plant Manager

Street Address (if different from Facility Street Address)

Same as above

City	State	ZIP Code
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Click here to enter text. Click here to enter text. Click here to enter text.

B. Indicate the relevant standard or requirement for which you request a compliance extension:

Title 40, Part 63, Subpart JJJJ (National Emission Standards for Hazardous Air Pollutants for Brick and Structural Clay Products Manufacturing).

II. TIMELINESS OF REQUEST

Pursuant to 40 C.F.R. Part 63, Subpart A, sources must submit requests for extension of compliance with a National Emission Standards for Hazardous Air Pollutants no later than 120 days prior to the affected source's compliance date (unless the elements are met for an alternative submittal date, as outlined in 40 C.F.R. § 63.6(i)). This request:

☒ (1) is being submitted on or before August 28, 2018 (120 days before the compliance deadline of December 26, 2018); or

☐ (2) is being submitted after August 28, 2018 but before December 26, 2018, because the need for the compliance extension arose after August 28, 2018, and the need arose due to circumstances beyond reasonable control of the owner or operator. An addendum may be included to explain the reasons for the delay in submittal.

Note: A nonfrivolous request under (1) will stay the applicability of the rule as to the emission points in question until the request is granted or denied. A denial will be effective as of the date of denial or the original compliance date, whichever is later. A nonfrivolous request under (2) will stay the applicability of the rule as to the emission points in question until such time as the request is granted or denied.

III. ELIGIBILITY

Are you eligible to apply for a compliance extension because you are unable to comply with the relevant standard by December 26, 2018 and need additional time for installation of controls (which includes time to achieve area source status)? 40 C.F.R. § 63.6(i)(4)(i)(A).

☒ Yes ☐ No

The statutory authority for compliance extensions under Clean Air Act Section 112(i) includes adopting controls or limits necessary to qualify as a "synthetic minor" or "area" source.

IV. COMPLIANCE SCHEDULE INFORMATION

- A. Select the applicable approach described below (Option 1 or 2) that will be taken by your facility to achieve compliance within one year of the compliance date for the relevant standard (including, if applicable, actions necessary for your facility to qualify as a synthetic area source). 40 C.F.R. § 63.6(i)(6)(i)(A). At your option, you may provide additional detail in an attachment to this form.

☐ **OPTION 1:** This facility intends to install controls to reduce emissions to the level of the applicable standard and will be applying for a state minor NSR construction permit, if required by the state regulations, to install the controls. If your compliance approach involves installing physical controls, undertaking material substitution, or some other method, you may wish to describe these controls further in an attachment to this submittal or EPA may request additional information regarding your approach. This application may be subject to withdrawal if circumstances change, such as if EPA revises the NESHAP such that compliance can be achieved by the facility without the need to install controls.

☒ **OPTION 2:** This facility needs additional time to become an area source. This facility has submitted or will submit a permit application seeking an area source level emission limit, such that it will not be subject to the NESHAP. If you are installing physical controls, undertaking material substitution, or restricting operations to become an area source, you may describe these controls further in an attachment to this submittal or EPA may request additional information regarding your approach. This application may be subject to withdrawal if circumstances change, such as a request to eliminate any such limitation that has been issued if EPA revises the NESHAP such that compliance can be achieved by the facility without the need for an area source permit.

B. Describe your compliance schedule. 40 C.F.R. § 63.6(i)(6)(i)(B)(1)-(2).

1. My facility will submit an application for any required permits by APRIL 30, 2019.
☒ Yes ☐ No
2. If compliance is to be achieved through a means other than becoming an area source, the facility will begin on-site construction, installation of emission control equipment, or initiate a process change within 30 days of obtaining any required permits for such action. 40 C.F.R. § 63.6(i)(6)(i)(B)(1). *If no permits are required for such action*, the facility will initiate the activities as applicable by the dates specified below:

- | | |
|---|---|
| <input type="checkbox"/> On-site construction | Date: Click here to enter text. |
| <input type="checkbox"/> Installation of controls | Date: Click here to enter text. |
| <input type="checkbox"/> Process change | Date: Click here to enter text. |
| <input type="checkbox"/> Application for _____ | Date: Click here to enter text. |

Comments (OPTIONAL):

This facility will achieve rule avoidance by becoming an Synthetic Minor. For this location to qualify for Synthetic Minor status, the facility will be installing a Dry Injection Fabric Filter (DIFF) system. This DIFF has already been ordered and will be installed according to the schedule listed in the Appendix.

3. Any restriction on emissions, on-site construction, installation of emission control equipment, or a process change will be completed by December 26, 2019. 40 C.F.R. § 63.6(i)(6)(i)(B)(1).

Comments (OPTIONAL):

As outlined in the Appendix, this facility plans to become a Synthetic Minor prior to the November 30, 2019.

4. Specify the date by which final compliance is to be achieved. 40 C.F.R. § 63.6(i)(6)(i)(B)(2).

Date: Boral plans to become a Synthetic Minor by November 30, 2019.

Comments (OPTIONAL):

Boral has encountered some delay from the original schedule because of permitting delays with the City of Corona for the foundation work.

- C. **You may provide additional information regarding your method of achieving compliance in an attachment to provide a fuller description of your control strategy than outlined above, as appropriate.**

Additional information is included in the attached Appendix.

V. CERTIFICATION

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify that the information contained in this request is true, accurate, and complete.

Name of Responsible Official (Print or Type) Title

John Quigley Plant Manager

Date

August 27, 2018

Signature of Responsible Official

A handwritten signature in blue ink, appearing to read "John Quigley", is written over a horizontal line.

Submittal Instructions: Submit your completed form, and any addenda, to:

U.S. Environmental Protection Agency
Attention: Mr. Brian Storey
Sector Policies and Programs Division
Office of Air Quality Planning and Standards
109 T.W. Alexander Drive , Mail Code: D243-04
Research Triangle Park, NC 27709

You may also wish to send a copy of this submittal to your state or local permitting authority. Be sure that the submittal is made by August 28, 2018 and that you retain proof of the date of submittal for your records.

APPENDIX

Request for Extension of Compliance

40 C.F.R. Part 63, Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants

Brick and Structural Clay Products Manufacturing Source Category

**Boral Roofing LLC
909 Railroad Street
Corona, CA 92882**

SUMMARY

Boral Roofing LLC (Boral) located at 909 Railroad Street in Corona, CA manufactures clay roof tile. Boral plans to install a Dry Injection Fabric Filter (DIFF) system to reduce the Hazardous Air Pollutants (mainly HF and HCl) from the roller kiln used in the manufacturing process to fire the clay.

This DIFF installation project began in 2017 and due to unforeseen issues with seismic and wind design calculations and acquiring local city permits, the project has been significantly delayed.

TIMETABLE

Previous Work

- ✓ February 2017 - Began discussions with scrubber manufacturers
- ✓ December 2017 – Submitted an application to South Coast Air Quality Management District for the construction permit to install the DIFF
- ✓ January 2018 – Secured internal capital approval for this project
- ✓ March 2018 – Ordered the DIFF from Hellmich and submitted 50% payment
- ✓ April 2018 – Submitted an application to the City of Corona for the foundation work

Current Situation

While the original project plan was to achieve Synthetic Minor status by installing the DIFF prior to the current MACT deadline of December 26, 2018. Boral has encountered several setbacks along the way:

- (1) Design Work for Seismic/Structural – Hellmich (DIFF manufacturer) has had some difficulty providing adequate design drawings to Boral because of the uniqueness of structures in Southern California. This has taken more time than first scheduled.
- (2) Permit for the Foundation Work – Boral applied for a permit from the City of Corona to conduct the foundation work in April 2018. Because the City of Corona is understaffed and outsourcing their application reviews, they are requiring over 30 days to process each review phase. At current, Boral is still awaiting a final permit in order to begin any ground work on this project.
- (3) Title V Modification – South Coast Air Quality Management District (SCAQMD) requires an official air emissions test on the DIFF stack prior to processing the Title V modification to Synthetic Minor. SCAQMD typically takes six months to process a permit modification.

Future Work

- ☐ September 2018 – Expect to receive the DIFF Construction Permit from South Coast Air Quality Management District
- ☐ October 2018 – Expect to receive the City of Corona permit for the foundation work
- ☐ November 2018 - Expect to receive DIFF components from Germany
- ☐ January 2019 – Expect to install/erect the DIFF unit
- ☐ February 2019 – Expect to commission the DIFF unit
- ☐ March 2019 – Expect to conduct air emissions testing of the DIFF stack
- ☐ May 2019 – Expect to submit an application to South Coast Air Quality Management District to modify the Title V air permit to include the Synthetic Minor status
- ☐ November 2019 – Expect to receive the modified Title V permit with the Synthetic Minor status from South Coast Air Quality Management District
- ☐ November 30, 2019 – Project complete